



# INDUSTRY CIRCULAR

**DEPARTMENT OF  
THE TREASURY**

**Bureau of Alcohol, Tobacco and Firearms**

**Washington, D.C. 20226**

**Number: 79-15**

**Date: November 8, 1979**

## **USE OF PLANT REGISTRY NUMBER ON SEALS USED TO SECURE CONVEYANCES TRANSPORTING DISTILLED SPIRITS**

**To Proprietors of Distilled Spirits Plants and  
Others Concerned:**

Purpose. Proprietors are reminded that where commercial seals used in accordance with 27 CFR 201.100(b) are marked with the plant registry number, the postal abbreviation of the State of registry is a necessary part of the plant registry number when used as a unique identifier for marking seals.

Background. Under 27 CFR 201.100(b) of the regulations implemented by Treasury Decision ATF-46, all seals, locks and other devices that are used on conveyances in which spirits are transferred in bond, withdrawn free of tax or withdrawn without payment of tax are to be approved by the Director prior to use. Industry Circular 77-19 instructed proprietors to submit samples of their commercial seals to the ATF National Laboratory for evaluation and subsequent approval or disapproval. Based on the examination of the sample seals, the Bureau issued ATF Ruling 78-1 which listed the criteria for use in evaluating seals. The ruling required the proprietor to serially number each seal and to mark each seal with the proprietor's name or a readily recognizable abbreviation of the proprietor's name or the plant registry number.

At the time of issuance of ATF Ruling 78-1, the Bureau presumed that proprietors were aware that the plant registry number, as defined in 27 CFR 201.11, includes the postal abbreviation of the State of registry. However, in a recent review of the impact of T.D. ATF-46 on distilled spirits plant supervision, the Bureau has found a cap seal which bears the required serial numbering and the proprietary marking "DSP-70."

Incomplete Registry Numbers. Proprietors should examine the marks on the commercial cap seals, railroad type strap seals, and other seals which have been approved for affixing to conveyances used to transport spirits in accordance with 27 CFR 201.100(b) and determine whether seals bearing plant registry numbers have complete markings. In the event that a proprietor finds that his seals bear incomplete plant registry numbers, he should inventory the seals and prepare a letterhead notice, in duplicate, for forwarding to the regional regulatory administrator of the region in which the distilled spirits plant is located. The regional office will notify the proprietor of any immediate corrective action which may be necessary to insure the integrity of the markings. However, the proprietor may continue to use such seals pending depletion of the inventory or unless notified otherwise by the regional regulatory administrator.

Inquiries. Inquiries concerning this circular should refer to its number and be addressed to the regional regulatory administrator of the region in which the distilled spirits plant is located.

*H. R. Dickerson*  
Director

Department of the Treasury  
Bureau of Alcohol, Tobacco and Firearms  
Washington, D.C. 20226

Official Business  
Penalty for Private Use, \$300

Postage and Fees Paid  
Department of the Treasury  
Treas 564

